IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION CASE NUMBER:

Dominique B. Lovejoy,

Plaintiff,

3:23-cv-05393-MGL

v.

Jason L. Richardson, Rocket Expediting, LLC, Super Ego Holdings, LLC, Super Ego Logistics, LLC, Stefan Perovic, and Sendmee Trucking, LLC,

Defendants.

DEFENDANTS' ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

Pursuant to Local Rule 26.01, the following constitute Defendants Rocket Expediting LLC, Super Ego Holdings, LLC, Super Ego Logistics, LLC, Stefan Perovic, Jason Lee Richardson and Sendmee Trucking, LLC's Answers to Interrogatories propounded by the Court.

A. State the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: There is no known subrogation interest in this case at this time.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: This case should be tried by a jury because the Plaintiff requested a jury trial in the underlying State Court action.

C. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: None of the Defendants are publicly owned companies.

D. State the basis for asserting your claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: Plaintiff's claim originated in the Richland County Court of Common Pleas, which is in the Columbia Division.

E. Is this action related to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: <u>Xavier Hannibal</u>, <u>George Dalton</u>, and <u>Pamela Dalton v. Rocket Expediting</u>, <u>LLC</u>, <u>Super Ego Holdings</u>, <u>LLC</u>, <u>Super Ego Logistics</u>, <u>LLC</u>, <u>Stefan Perovic</u>, <u>Jason Richardson</u>, and <u>Sendmee Trucking</u>, <u>LLC</u>, case no. 3:23-cv-02702-MGL, currently pending in the Columbia Division, arises from the same motor vehicle accident and involves the same Defendants.

F. [Defendants Only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: The Defendants are properly identified.

G. [Defendants Only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: The Defendants do not contend at this time some other person or legal entity is, in whole or in part, liable to it or the party asserting a claim against it in this matter.

H. [Parties or Intervenors in a Diversity Case.] In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

RESPONSE: Defendant Richardson is a citizen and resident of Alabama.

Defendant Sendmee Trucking, LLC is a Limited Liability Company organized under the laws of the State of Alabama with its principal place of business in Alabama. Additionally, all members of the LLC are residents of the state of Alabama.

Defendant Rocket Expediting, LLC is a Limited Liability Company organized under the laws of the State of Ohio with its principal place of business in Ohio. Additionally, all members of the LLC are residents of the state of Ohio.

Defendant Super Ego Holdings, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Super Ego Logistics, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Stefan Perovic is a citizen and resident of the State of Illinois.

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